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June 8, 2016

**BY ECF**

Magistrate Judge James Orenstein  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Orlando Ceron v. T & T Scrap, LLC  
Civil Action No. 1:16-cv-0063 (ARR) (JO)

Dear Magistrate Judge Orenstein:

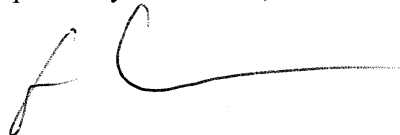
Reference is made to our telephone conference on June 7, 2016, with respect to the settlement of the above referenced matter.

Pursuant to your request, please find attached this firm's time sheet and invoice for the work performed in this matter for purposes of complying with the Lodestar method for reasonable attorneys fees. Please be advised that during settlement discussions, our firm agreed to cap our legal fees to \$10,000 plus recovery of disbursements with our client.

As such, we respectfully request this Court to approve the parties' Agreement.

If there is any question in connection with the foregoing, please do not hesitate to contact the undersigned.

Respectfully Submitted,



Sang J. Sim

## LEGAL FEE TIME SHEET

TIME SHEET IN RE CERON V. T&amp;T SCRAP, LLC, 16-CV-00063

|   | Hours | Attorney | Charge      |
|---|-------|----------|-------------|
| 12/22/2016 Meet with client for initial consultation.         | 1.00  | SS       | \$ 450.00   |
| Received Documents from Mr. Ceron. Review and                 |       |          |             |
| 1/2/2016 prepare Excel financial analysis of wages underpaid. | 3.75  | SS       | \$ 1,687.50 |
| 1/3/2016 Prepare Summons and Complaint                        | 3.75  | YL       | \$ 1,125.00 |
| 1/6/2016 Continue preparing Summons and Complaint             | 2.50  | YL       | \$ 750.00   |
| Submission of Court stamped copy of Summons and               |       |          |             |
| 1/8/2016 Complaint to service processor                       | 0.25  | YL       | \$ 75.00    |
| 1/15/2016 Review Summons and Complaint and Edit               | 1.75  | SS       | \$ 787.50   |
| File Summons and Complaint and coordinate with                |       |          |             |
| 1/16/2016 process server                                      | 0.50  | YL       | \$ 150.00   |
| Initial discussion with Mr. Marino, counsel for               |       |          |             |
| 2/2/2016 Defendant  | 0.25  | SS       | \$ 112.50   |
| File affidavit of Service. Review email from Defense          |       |          |             |
| 3/2/2016 Counsel  | 0.25  | YL       | \$ 75.00    |
| Review Defendant's Motion to extend time to                   |       |          |             |
| 3/3/2016 answer. Discussion with Defendant's Counsel.         | 0.25  | SS       | \$ 112.50   |
| 3/3/2016 Review of corporate disclosure                       | 0.10  | YL       | \$ 30.00    |
| 4/1/2016 Review Answer to Complaint                           | 0.50  | SS       | \$ 225.00   |
| Discussion with Mr. Marino in re Defendant's                  |       |          |             |
| defenses, including common carrier exception and              |       |          |             |
| alleged payments made indirectly to Plaintiff by              |       |          |             |
| 4/5/2016 Defendant  | 0.75  | SS       | \$ 337.50   |
| Research Common Carrier Exception under New                   |       |          |             |
| 4/5/2016 York Law   | 3.75  | SS       | \$ 1,687.50 |
| Interview plaintiff and Plaintiff's wife in re defenses       |       |          |             |
| 4/6/2018 raised by Defendant.                                 | 2.50  | SS       | \$ 1,125.00 |
| 4/6/2016 Review Order of the Court in re scheduling order     | 0.10  | SS       | \$ 45.00    |
| Review Amended Answer filed by Defendant.                     |       |          |             |
| 4/8/2016 Review email from Defendant                          | 0.25  | SS       | \$ 112.50   |
| Email from Mr. Marino in re proposed T/C                      |       |          |             |
| 4/8/2016 conference. Draft email to Mr. Marino                | 0.25  | SS       | \$ 112.50   |

## LEGAL FEE TIME SHEET

|           |  |      |    |    |        |
|-----------|--|------|----|----|--------|
|           | Discussion with Mr. Marino in re their proposed defenses and Plaintiff's position in re common carrier exception and Indirect payments to Plaintiff    | 0.50 | SS | \$ | 225.00 |
| 4/9/2016  |  |      |    |    |        |
| 4/10/2016 | Settlement discussions   | 0.25 | SS | \$ | 112.50 |
|           | Telephone Discussion with Mr. Marino in re settlement proposal   | 0.25 | SS | \$ | 112.50 |
| 4/11/2016 |  |      |    |    |        |
| 4/13/2016 | Meeting with Client in re settlement proposal  | 0.75 | SS | \$ | 337.50 |
|           | Telephone Discussion with Mr. Marino in re counter proposal after discussion with client   | 0.25 | SS | \$ | 112.50 |
| 4/15/2016 |  |      |    |    |        |
|           | Telephone Discussion with Mr. Marino in re proposal from Defendant. Draft multiple emails to Defendant. Review multiple email responses from Defendant | 0.75 | SS | \$ | 337.50 |
| 4/19/2016 |  |      |    |    |        |
|           | Email with Client in re settlement proposal from defendant   | 0.25 | SS | \$ | 112.50 |
| 4/19/2016 |  |      |    |    |        |
|           | T/C with Mr. Marino in re settlement counter proposal  | 0.25 | SS | \$ | 112.50 |
| 4/25/2016 |  |      |    |    |        |
| 4/26/2016 | Review email from Defendant  | 0.10 | SS | \$ | 45.00  |
|           | T/C with Mr. Marino, settlement agreed by the parties. T/C with Client. Review and draft multiple emails to Defense counsel                            | 1.25 | SS | \$ | 562.50 |
| 4/27/2016 |  |      |    |    |        |
|           | Review and draft multiple emails to defense counsel  | 0.25 | SS | \$ | 112.50 |
| 4/28/2016 |  |      |    |    |        |
| 4/29/2016 | Draft Settlement Agreement   | 1.50 | SS | \$ | 675.00 |
|           | Review and draft multiple emails to defense counsel  | 0.50 | SS | \$ | 225.00 |
| 5/2/2016  |  |      |    |    |        |
|           | Review email and draft email to defense counsel in re settlement   | 0.25 | SS | \$ | 112.50 |
| 5/10/2016 |  |      |    |    |        |
|           | Review Defendant's version of settlement agreement, with confession of judgment  | 1.25 | SS | \$ | 562.50 |
| 5/12/2016 |  |      |    |    |        |
|           | Email Defendant with approval and consent for settlement agreement with confession of judgment   | 0.25 | SS | \$ | 112.50 |
| 5/16/2016 |  |      |    |    |        |
|           | with minor revisions   |      |    |    |        |
|           | Email from Defendant in re acceptance of Plaintiff's revisions. Draft email to defense counsel   | 0.50 | SS | \$ | 225.00 |
| 5/17/2016 |  |      |    |    |        |
|           | in re same   |      |    |    |        |
|           | Meeting with Client to review Settlement Agreement and prepare W-9 and W-4 forms. Forward executed agreement to defendant's counsel                    | 1.25 | SS | \$ | 562.50 |
| 5/23/2016 |  |      |    |    |        |
|           | Email with Defendant in re filing stip of discontinuance with executed settlement  | 0.25 | SS | \$ | 112.50 |
| 6/2/2016  |  |      |    |    |        |
|           | agreement  |      |    |    |        |

TOTAL 33.05

\$ 13,770.00

PARK SIM GLOBAL LAW GROUP LLP

LEGAL FEE TIME SHEET

DISBURSEMENTS

|                 |           |
|-----------------|-----------|
| Filing Fee      | \$ 400.00 |
| Service Process | 53.00     |

|                     |        |
|---------------------|--------|
| TOTAL DISBURSEMENTS | 453.00 |
|---------------------|--------|

|                              |              |
|------------------------------|--------------|
| TOTAL FEES AND DISBURSEMENTS | \$ 14,223.00 |
|------------------------------|--------------|

ATTORNEY BILLING RATES

Per Hour

|             |           |
|-------------|-----------|
| SANG J. SIM | \$ 450.00 |
| YOSEF LEE   | \$ 300.00 |